



RQ-3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 2002

Donna M. Anderson, Treasurer
 National Republican Congressional Committee –
 Expenditures
 320 First Street
 Washington, DC 20003

Identification Number: C00075820

Reference: June Monthly Report (5/1/02-5/31/02) and Amended July Monthly Report (6/1/02-6/30/02) received 8/20/02

Dear Ms. Anderson:

This letter is to inform you that as of November 20, 2002 the Commission has not received your response to our requests for additional information dated October 23, 2002. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate response must be received at the Commission by December 11, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter, please contact Andrea Needles on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson
 Assistant Staff Director
 Reports Analysis Division

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Donna M. Anderson, Treasurer
National Republican Congressional Committee –
Expenditures
320 First Street
Washington, DC 20003

OCT 2 3 2002

Identification Number: C00075820

Reference: June Monthly Report (5/1/02-5/31/02)

Dear Ms. Anderson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the Primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR § 110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE - EXPENDITURES
PAGE 2

writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR § 110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Your report discloses a payment(s) on Schedule D to "Jones Airways LLC", which has not been recorded on a disbursement schedule. Debt payments must be reflected on Schedule B or H4 as well as on Schedule D. Please amend your report to clarify this discrepancy. 2 U.S.C. §434(b)(5)(D)

-Line 18 of the Detailed Summary Page of your report discloses a total of \$2,515,573.92 in transfers-in from the non-federal account(s). The sum of the entries itemized on Schedule H3, however, indicates the total to be \$2,638,972.44. Please amend your report to clarify the discrepancy.

-Line 21(b) of the Detailed Summary Page of your report discloses a total of \$27,259.71 in other federal operating expenditures. The sum of the entries itemized on Schedule B, however, indicates the total to be \$40,528.17. Please amend your report to clarify the discrepancy.

-Your report discloses in-kind contributions ("donations") from corporations on Schedule H4, supporting Line 21(a) of the Detailed Summary Page (pertinent portions attached). Pursuant to Advisory Opinion 1992-33, the Commission concluded that a "national party committee may accept corporate in-kind donations in connection with fundraising activities" as long as "the federal share of goods or services is paid or transferred to the non-federal account in advance" of the acceptance of the corporate in-kind donations by the federal account.

Advisory Opinion 1992-33 also discloses a detailed method for reporting the receipt and use of in-kind contributions as follows:

1. The transfer of the in-kind corporate contribution from the non-federal

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE – EXPENDITURES
PAGE 3

account to the federal account should be disclosed on Schedule H3. The itemization on Schedule H3 should include the date the Committee received the in-kind contribution, the amount of the contribution and the fundraising event involved.

2. The use or expenditure of in-kind corporate contributions should be disclosed on Schedule H4 as non-federal share disbursements. The itemization should provide the same donor identification information required on a Schedule A for in-kind contributions for Federal elections.

3. A second entry on Schedule H4 should then disclose the advance or contemporaneous payment of the federal account's share of the in-kind corporate contribution to the non-federal account.

Please amend your report to properly disclose the in-kind corporate contributions received by your committee (example enclosed).

-Your EVENT YEAR-TO-DATE calculations for "312-000-000-310" and "313-335" are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designation and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 594-1130.

Sincerely,

Andrea S. Needles

Andrea S. Needles
Senior Campaign Finance Analyst
Reports Analysis Division

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 765 / 838

 21b 22 23 24 25
 28 27 28a 28b 28c 29

 Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions
 or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full) :

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. SCOTT ARMEY FOR CONGRESS

Mailing Address

P.O. BOX 51342

DENTON TX 76206

City

DENTON

State

TX

Zip Code

76206

Purpose of Disbursement

Direct Contribution - HOUSE

Candidate Name

15
Category/
Type

Date of Disbursement

05 M / 03 D / 17 Y 2002 T

Office Sought

House

Disbursement For:

2002

Senate

x Primary

General

President

Other (specify) ▼

State: TX

District: 26

Transaction ID: B23053102A2-13459

Full Name (Last, First, Middle Initial)

B. ANN WOMER BENJAMIN FOR CONGRESS

Mailing Address

PO BOX 122

AURORA OH 44212

City

AURORA

State

OH

Zip Code

44202

Purpose of Disbursement

Direct Contribution - HOUSE

Candidate Name

15
Category/
Type

Date of Disbursement

05 M / 03 D / 17 Y 2002 T

Office Sought

House

Disbursement For:

2002

Senate

x Primary

General

President

Other (specify) ▼

State: OH

District: 17

Transaction ID: B23053102A2-13460

Full Name (Last, First, Middle Initial)

C. GEOFF DAVIS FOR CONGRESS

Mailing Address

PO BOX 17192

FORT MITCHELL KY 41017

City

FORT MITCHELL

State

KY

Zip Code

41017

Purpose of Disbursement

Direct Contribution - HOUSE

Candidate Name

15
Category/
Type

Date of Disbursement

05 M / 03 D / 17 Y 2002 T

Office Sought

House

Disbursement For:

2002

Senate

x Primary

General

President

Other (specify) ▼

State: KY

District: 04

Transaction ID: B23053102A2-13461

SUBTOTAL of Disbursements This Page (optional)

10402.00

TOTAL Year Period (last page this line number only)

DISBURSEMENT SCHEDULE H4 (FEC Form 3X)
JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE

 PAGE 788 / 818
 FOR LINE 21a OF FORM 3X

NAME OF COMMITTEE (In Full) NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE			
A. Full Name (Last, First, Middle Initial) INFOCUS MANAGEMENT CORP.		Type of Allocated Activity: <input type="checkbox"/> Admin/Voter Drive <input checked="" type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support Event Year-To-Date 1967936.00	
Mailing Address 325 SPRINGSIDE DRIVE AKRON OH 44333 City State Zip Code AKRON OH 44333		COM Category/Type Date N M / D Q / Y Y Y Y 05 24 2002	
Purpose/Event: Phone Banks Description: 312-000-000-311			
FEDERAL SHARE + NON-FEDERAL SHARE = TOTAL AMOUNT			
59143.42 + 1207.01 = 60350.43			
		Transaction ID: H4053102A2-13444	
A. Full Name (Last, First, Middle Initial) INFOCUS MANAGEMENT CORP.		Type of Allocated Activity: <input type="checkbox"/> Admin/Voter Drive <input checked="" type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support Event Year-To-Date 3288884.30	
Mailing Address 325 SPRINGSIDE DRIVE AKRON OH 44333 City State Zip Code AKRON OH 44333		COM Category/Type Date N M / D Q / Y Y Y Y 05 24 2002	
Purpose/Event: Phone Banks Description: 312-000-000-310			
FEDERAL SHARE + NON-FEDERAL SHARE = TOTAL AMOUNT			
148186.61 + 4683.10 = 152769.81			
		Transaction ID: H4053102A2-13445	
A. Full Name (Last, First, Middle Initial) ASHLAND INC.		Type of Allocated Activity: <input type="checkbox"/> Admin/Voter Drive <input checked="" type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support Event Year-To-Date 23637.83	
Mailing Address 801 PENNSYLVANIA AVE. NW WASHINGTON DC 20004 City State Zip Code WASHINGTON DC 20004		COM Category/Type Date N M / D Q / Y Y Y Y 05 06 2002	
Purpose/Event: GOLF TOURNAMENT IN KIND Description:			
FEDERAL SHARE + NON-FEDERAL SHARE = TOTAL AMOUNT			
.00 + 3190.53 = 3190.53			
		Transaction ID: H4053102A2-13446	
SUBTOTAL of Joint Federal and Non-Federal Activity This Page			
FEDERAL SHARE * NON-FEDERAL SHARE = TOTAL AMOUNT			
207330.23 * 8960.64 = 216310.87			
TOTAL This Period (and page for each line only) (Federal share to 21(a)(1) and non-Federal share to 21(a)(2))			
FEDERAL SHARE * NON-FEDERAL SHARE = TOTAL AMOUNT			
TOTAL This Period for the Non-Federal Share (used for line 31 of the detailed summary page)			

DISBURSEMENT SCHEDULE H4 (FEC Form 3X)
JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE

PAGE 750 / 830

NAME OF COMMUNES TO FILE

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE

A. Full Name (Last, First, Middle Initial) THE COCA-COLA COMPANY			Type of Allocated Activity: <input type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Exempt	<input checked="" type="checkbox"/> Fundraising <input type="checkbox"/> Direct Candidate Support
Mailing Address 800 CONNECTICUT AVENUE NW #ITE 711			Event Year-To-Date 23837.83	
City WASHINGTON	State DC	Zip Code 20406	Category/ Type COM	
Purpose/Event: GOLF TOURNEY INKIND				M M I D S I Y Y Y 05 06 2002
Description:				
FEDERAL SHARE		+ NON-FEDERAL SHARE	=	TOTAL AMOUNT 3190.53
.00				
Transaction ID: H4053102A2-13447				
A. Full Name (Last, First, Middle Initial) COGRAS			Type of Allocated Activity: <input type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Exempt	<input checked="" type="checkbox"/> Fundraising <input type="checkbox"/> Direct Candidate Support
Mailing Address 801 PENNSYLVANIA AVE. NW 1000B WASHINGTON DC 20004			Event Year-To-Date 23637.83	
City WASHINGTON	State DC	Zip Code 20004	Category/ Type COM	
Purpose/Event: GOLF TOURNEY INKIND				M M I D S I Y Y Y 05 06 2002
Description:				
FEDERAL SHARE		+ NON-FEDERAL SHARE	=	TOTAL AMOUNT 3190.53
.00				
Transaction ID: H4053102A2-13448				
A. Full Name (Last, First, Middle Initial) INTERNATIONAL MASS RETAIL ASSOC.			Type of Allocated Activity: <input type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Exempt	<input checked="" type="checkbox"/> Fundraising <input type="checkbox"/> Direct Candidate Support
Mailing Address 1700 N. MOORE ST. STE. 2250 ARLINGTON VA 22209			Event Year-To-Date 548641.58	
City ARLINGTON	State VA	Zip Code 22209	Category/ Type COM	
Purpose/Event: RMBC INKIND				M M I D S I Y T Y 05 22 2002
Description:				
FEDERAL SHARE		+ NON-FEDERAL SHARE	=	TOTAL AMOUNT 3836.00
.00				
Transaction ID: H4053102A2-13449				

Subtotal of Joint Federal and Non-Federal Activity This Page

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
6,100		10317.06		10317.06

TOTAL THIS PERIOD (last page for each line only) (Federal share to 21(e)(1) and non-Federal share to 21(e)(2))

TOTAL AMOUNT

NON-RESIDENTS: CHARGE

TOTAL This Period for the Non-Federal Share
(used for line 33 of the detailed summary page)

DISBURSEMENT SCHEDULE H4 (FEC Form 3X)
JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE

 PAGE 760 / 838
 FOR LINE 21a OF FORM 3X

NAME OF COMMITTEE (In Full)

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE

A. Full Name (Last, First, Middle Initial) MICROSOFT				Type of Allocated Activity: <input type="checkbox"/> Admin./Voter Drive <input checked="" type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support Mailing Address 21 DUPONT CIRCLE NW 5TH FLOOR City State Zip Code WASHINGTON DC 20036	Event Year-To-Date 23637.83
Purpose/Event: GOLF TOURNEY INKIND				Category/ Type	Date N M D Y Y Y 05 06 2002
Description:					
FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT	
				3190.53	
Transaction ID: H4053102A2-13450					
A. Full Name (Last, First, Middle Initial) NATIONAL BEER WHOLESALEPS ASSOCIATION				Type of Allocated Activity: <input type="checkbox"/> Admin./Voter Drive <input checked="" type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support Mailing Address 1100 S. WASHINGTON STREET ALEXANDRIA VA 22314 City State Zip Code ALEXANDRIA VA 22314	Event Year-To-Date 23637.83
Purpose/Event: GOLF TOURNEY INKIND				Category/ Type	Date N M D Y Y Y 05 06 2002
Description:					
FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT	
				3190.53	
Transaction ID: H4052102A2-13451					
A. Full Name (Last, First, Middle Initial) UNION PACIFIC				Type of Allocated Activity: <input type="checkbox"/> Admin./Voter Drive <input checked="" type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support Mailing Address 600 12TH ST NW SUITE 340 WASHINGTON DC 20005 City State Zip Code WASHINGTON DC 20005	Event Year-To-Date 23637.83
Purpose/Event: GOLF TOURNEY INKIND				Category/ Type	Date N M D Y Y Y 05 06 2002
Description:					
FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT	
				3190.53	
Transaction ID: H4053102A2-13452					

SUBTOTAL of Joint Federal and Non-Federal Activity This Page

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
0.00		9571.59		9571.59

TOTAL This Period (last page for each line only) (Federal share to 21(a)(b) and non-Federal share to 21(a)(d))

TOTAL AMOUNT

NON-FEDERAL SHARE

 TOTAL This Period for the Non-Federal Share
 (used for line 21 of the detailed summary page)

DISBURSEMENT SCHEDULE H4 (FEC Form 3X)
JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE

 PAGE 761 / 838
 FOR LINE 21a OF FORM 3X

NAME OF COMMITTEE (in full) NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE			
A. Full Name (Last, First, Middle Initial) VERIZON SERVICES CORP		Type of Allocated Activity: <input type="checkbox"/> Admin/Voter Drive <input checked="" type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support Event Year-To-Date 23637.83	
Mailing Address 1300 I STREET NW	SUITE 400W	City WASHINGTON	State DC
			Zip Code 20005
Category/ Type			
Purpose/Event: GOLF TOURNEY IN KIND			
Description:		Date	05 05 2002
FEDERAL SHARE + NON-FEDERAL SHARE = TOTAL AMOUNT .00 + 3190.53 = 3190.53		Transaction ID: H4053102A2-13453	
SUBTOTAL of Joint Federal and Non-Federal Activity This Page FEDERAL SHARE + NON-FEDERAL SHARE = TOTAL AMOUNT 0.00 + 3190.53 = 3190.53			
TOTAL This Period (last page for each line only)(Federal share to 21(a)(i) and non-Federal share to 21(a)(ii)) FEDERAL SHARE + NON-FEDERAL SHARE = TOTAL AMOUNT 3198181.67 + 2122234.27 = 5320415.94			
TOTAL This Period for the Non-Federal Share (used for line 31 of the detailed summary page)			